<u>REMARKS</u>

Favorable reconsideration of this application, as presently amended and in light of the following discussion, is respectfully requested.

Claims 1-11, 21-25, 29, and 30 are currently pending. Claims 1, 11, 21, 25, 29, and 30 have been amended by the present amendment. The changes to the claims are supported by the originally filed specification and do not add new matter.

In the outstanding Office Action, Claim 4 was rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement. Claims 1-22, 25, 26, 29, and 30 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,310,692 to <u>Fan et al.</u> (hereinafter "the '692 patent"); Claims 23 and 27 were rejected under 35 U.S.C. § 103(a) as being unpatentable over the '692 patent in view of U.S. Patent No. 6,601,040 to <u>Kolls</u> (hereinafter "the '040 patent"); and Claims 24 and 28 were rejected under 35 U.S.C. § 103(a) as being unpatentable over the '692 patent in view of U.S. Patent No. 5,901,286 to <u>Danknick et al.</u> (hereinafter "the '286 patent").[1]

Applicants respectfully traverse the rejection of Claim 4 under 35 U.S.C. § 112, first paragraph. Figure 28 and the discussion on page 42 of the specification disclose that a report is sent out by a facility manager PC on a <u>monthly</u> basis. Applicants respectfully submit that this provides support for transmitting the second device information to the second computer <u>periodically</u>, regardless of a content of the second device information, as recited in Claim 4. As the discussion of Figure 28 makes clear, the report is sent monthly, regardless of the content of the report. Accordingly, Applicants respectfully traverse the rejection of Claim 4 under 35 U.S.C. § 112, first paragraph.

Amended Claim 1 is directed to a method of monitoring a device communicatively coupled to a network, comprising: (1) obtaining, by a first monitoring computer <u>through a</u>

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[1] However, Applicants note that Claims 26, 27, and 28 were previously canceled.

firewall using a first Internet protocol, first device information of the device, the first device

information including status information obtained from sensors of the device, and a device

identification of the device; (2) storing, by the first monitoring computer, the obtained first

device information; (3) processing the first device information and previously stored status

information of the device monitored by the first monitoring computer to generate second

device information that includes the first device information and the stored status

information; (4) transmitting the second device information using a second Internet protocol

from the first monitoring computer to a second computer; and (5) receiving the second device

information by the second computer. Further, Claim 1 clarifies that the first monitoring

computer is remote from the device, and the first monitoring computer is the first computer to

obtain the device information from the device. Claim 1 been amended for the purpose of

clarification only and no new matter has been added.[2]

The '692 patent is directed to a printer resource management system that includes a

database that stores, for a printer, at least one pair of attributes that are representative of a

printer resource level and a printer resource threshold for preventive monitoring of the printer

resource. Further, the '692 patent discloses that the printer resource manager receives the

updated printer resource level from the printer, (e.g., via SNMP), updates the level in the

database, compares the resource level with the corresponding resource threshold to determine

whether the corresponding printer resource level is deficient, and generates and outputs an

advance notification **if the printer resource level is determined to be deficient**. In

particular, as shown in Figure 3, the '692 patent discloses a printer 250, a server 240 having

the print resource manager 248, and a client 220. Further, as shown in the flowchart in

Figure 4, the notification of the low printer resource level is dependent upon the comparison

of the resource level with the threshold.

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[2] See, e.g., the firewall shown in Figure 5.

However, Applicants respectfully submit that the '692 patent fails to disclose

obtaining, by a first monitoring computer <u>through a firewall</u> using a first Internet protocol,

first device information of the device, as recited in amended Claim 1. '692 Figure 3 does not

show that the server obtains device information of the printer 250 through a firewall, as

required by Claim 1. Moreover, Applicants respectfully submit that one of ordinary skill in

the art would not be motivated to insert a firewall between the server 240 and the printer 250

shown in Figure 3 of the '692 patent.

Further, Applicants respectfully submit that the '692 patent fails to disclose the step of

<u>processing the first device information and previously stored status information of the device</u>

<u>monitored by the first monitoring computer to generate second device information</u> that

includes the first device information and the stored status information, as recited in amended

Claim 1. In this regard, Applicants note that the Office Action asserts that the stored

information can include an e-mail address of the administrator or end users who are to

receive the notification. However, Applicants note that amended Claim 1 clarifies that the

second device information is generated from <u>previously stored status information</u> of the

device as well as the first device information obtained from the device.

Accordingly, for the reasons stated above, Applicants respectfully submit that the

rejection of Claim 1 (and all similarly rejected dependent claims) is rendered moot by the

present amendment to Claim 1.

Independent Claim 11 is directed to a system for monitoring a device and includes the

firewall limitation recited in Claim 1 as well as means for processing the first device

information and <u>previously</u> stored status information of the device to generate second device

information. Independent Claims 21, 25, 29, and 30 recite similar limitations. As discussed

above, these limitations are not disclosed by the '692 patent and would not have been obvious

based on the teachings of the '692 patent. Accordingly, for the reasons stated above,

Applicants respectfully submit that the rejections of Claims 11, 21, 25, 29, and 30 are rendered moot by the present amendment to the independent claims.

Regarding the rejection of dependent Claims 27 and 28, Applicants respectfully submit that those rejections were rendered moot by the previously cancellation of those claims. Further, regarding the rejection of dependent Claims 23 and 24 under 35 U.S.C. § 103, Applicants respectfully submit that the '286 and '040 patents fail to remedy the deficiencies of the '692 patent, as discussed above. Accordingly, Applicants respectfully submit that the rejections of Claims 23 and 24 are rendered moot by the present amendment to Claim 21.

Further, Applicants note that Claim 2 clarifies that the first Internet protocol and the second Internet protocol are a same Internet protocol. In this regard, Applicants note that Office Action refers to column 4, lines 4-8 and 59-62 in the '692 patent as disclosing this limitation. However, Applicants note that the '692 patent merely discloses that SNMP is used to communicate between the server and the printer, and that the notification from the server can take place using e-mail or direct paging. Applicants respectfully submit that this is not a disclosure that the first Internet protocol and the second Internet protocol recited in Claim 1 are the same Internet protocol, as required by Claim 2. Rather, the '692 patent appears to disclose different protocols.

Further, regarding Claim 4, Applicants note that Claim 4 clarifies that the transmitting step comprises transmitting the second device information to the second computer periodically regardless of a content of the second device information. On the contrary, the '692 patent discloses sending information when a printer resource is below a particular threshold. The '692 patent does not disclose transmitting information periodically regardless of the content of the information, as required by Claim 4. Accordingly, for this additional reason, Applicants respectfully submit that Claim 4 patentably defines over the '692 patent.

Further, Applicants note that Claim 5 states that the first device information

comprises an Internet electronic mail message, and the second device information transmitted

by the first monitoring computer comprises an electronic mail message. As discussed above,

the '692 patent discloses <u>SNMP</u> for communication between the server and the printer, and

discloses the use of e-mail for communication from the server to an external device. While

the Office Action admits that the '692 patent does not disclose the use of e-mail between the

printer and the server, the Office Action asserts that the use of e-mail would have been

obvious because "e-mail is a well-known push-base messaging system." Applicants

respectfully request that the Office provide evidence that the sending of e-mail by a printer to

a server was well-known in the 1999 time frame.

Thus, it is respectfully submitted that independent Claims 1, 11, 21, 25, 29, and 30

(and all associated dependent claims) patentably define over any proper combination of the
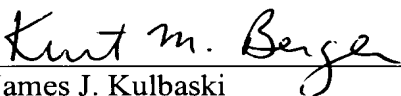
'692, '286, and '040 patents.

Consequently, in view of the present amendment and in light of the above discussion,

the outstanding grounds for rejection are believed to have been overcome. The application as

amended herewith is believed to be in condition for formal allowance. An early and

favorable action to that effect is respectfully requested.

Respectfully submitted,

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